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December 23, 2015

Via ECF and Hand Delivery

Hon. Richard M. Berman
 United States District Court, Southern District of New York
 Daniel Patrick Moynihan Courthouse
 500 Pearl Street, Courtroom 17B
 New York, New York 10007

Re: *BlackRock Allocation Target Shares, et al. v. Wells Fargo Bank, N.A.*, 14-cv-9371;
Phoenix Light SF Ltd. v. Wells Fargo Bank, N.A., 14-CV-10102; *Nat'l Credit Union
 Admin. Board v. Wells Fargo Bank, N.A.*, 14-CV-10067; *Royal Park Investments SA/NV
 v. Wells Fargo Bank, N.A.*, 14-CV-9764; *BlackRock Balanced Capital Portfolio (FI), et
 al. v. Deutsche Bank National Trust, et al.*, 14-cv-9367

Dear Judge Berman:

On behalf of all of the parties in the above-referenced cases, we write in response to the Court's request to identify the trusts that are Pooling and Servicing Agreement ("PSA") Trusts or Indenture Trusts. *See* Defs. Motion to Dismiss Decls., Exs. D and E. (Attached as Exhibit A).

Case Name	PSA Trusts	Indenture Trusts	Total Trusts
<i>BlackRock Balanced Capital Portfolio (FI), et al. v. Deutsche Bank National Trust, et al.</i>	500	64	564
<i>BlackRock Allocation Target Shares, et al. v. Wells Fargo Bank, N.A.</i>	261	12	273
<i>Phoenix Light SF Ltd. v. Wells Fargo Bank, N.A.</i>	11 ¹	1	12
<i>Nat'l Credit Union Admin. Board v. Wells Fargo Bank, N.A.</i>	17	1	18
<i>Royal Park Investments SA/NV v. Wells Fargo Bank, N.A.</i>	2	0	2

¹ The Phoenix Light Plaintiffs' FFML 2006-FFA Trust certificates were issued pursuant to an agreement entitled a "Trust Agreement," rather than an agreement entitled a "Pooling and Servicing Agreement," an arrangement that the Phoenix Light Plaintiffs submit is akin to an indenture structure. However, for the purposes of this action only, the Phoenix Light Plaintiffs are willing to stipulate that the Trust Indenture Act claims asserted with respect to the FFML 2006-FFA Trust certificates would be subject to dismissal under the Second Circuit's ruling in *Ret. Bd. of the Policemen's Annuity & Ben. Fund of the City of Chicago v. Bank of New York Mellon*, 775 F.3d 154 (2d Cir. 2014).

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Please let us know if you have any questions or need additional information.

Respectfully submitted,

/s/ Jayant W. Tambe

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Enclosure

cc: All Counsel of Record (via ECF)